

Honorable Marvin F. Jones  
Administrative Law Judge  
U.S. Environmental Protection Agency  
324 East 11th Street  
Kansas City, Missouri 64106

Re: Olin Corporation,  
Water Services Division  
RCRA - Docket No. 84-H-0015

Dear Judge Jones:

This is in response to your letters dated May 18, 1984, and June 11, 1984, in which you requested certain information. I believe that the following will be responsive to your request.

I. List of proposed witnesses for Complainant:

1. Mr. Wayne Kaiser will testify about EPA procedures relating to Part B Permit Applications in general and Respondent's Application in particular, and about the development of the civil penalty in the instant case.

2. Mrs. Karen Flournoy will testify about (1) Part B information requirements; (2) Part B procedures; (3) EPA's efforts to assist Respondent in complying with the regulations relating to Part B Permit Applications; (4) Incompleteness of and deficiencies in Respondent's Part B submittal.

II. List of exhibits for Complainant:

1. September 9, 1983 EPA Memorandum on "Failure to Submit and Submittal of Incomplete Part B Permit Applications;"

SYMBOL	CONCURRENCES			
SURNAME				
DATE				

EPA Form 1320-1 (12-70)



R00011130  
RCRA Records Center



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2. September 13, 1983 letter from EPA and the Kansas Department of Health and Environment indicating request for submittal of Part B Permit Application;
3. March 4, 1983 Part B Permit Application from Respondent;
4. March 16, 1983 letter from EPA to Respondent indicating receipt of Respondent's Part B Permit Application;
5. May 5, 1983 letter from EPA to Respondent discussing incompleteness of and the deficiencies in Respondent's Part B Permit Application;
6. June 23, 1983, Letter of Warning from EPA to Respondent requiring Respondent to cure the deficiencies in its Part B Permit Application by July 18, 1983 or face enforcement action;
7. July 18, 1983, letter from Respondent to EPA indicating Respondent's failure to complete its Application and cure deficiencies discussed in EPA's letter of May 5, 1983;
8. March 29, 1984, letter from EPA to Respondent reiterating the incomplete nature of Respondent's submittal and the deficiencies discussed in EPA's letter of May 5, 1983. (Copies of exhibits are enclosed and marked as requested.)

Should you have any questions concerning this matter, please, contact me at 374-7440.

Very truly yours,

Baerbel E. Schiller  
Assistant Regional Counsel

Enclosures



Certificate of Service

The original of this letter was hand-delivered to the Regional Hearing Clerk, a true and correct copy was hand-delivered to the Honorable Marvin E. Jones, both at the above address, and a true and correct copy was sent by Certified Mail, Return Receipt Requested to Teresa T. Ciccotelli, Esq., Olin Corporation, 120 Long Ridge Road, Stamford, Connecticut 06904, on this 3<sup>rd</sup> day of August, 1984.

Baerbel E. Schiller

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